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Attorneys for Defendant Church of  
Scientology International, Religious Technology  
Center, Church of Scientology of Texas and  
Cathy Norman

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

GERALD ARMSTRONG,  
Plaintiff.

CASE NO. CV-N-97-00670 ECR (RAM)

vs.

STIPULATED DISCOVERY PLAN  
AND SCHEDULING ORDER  
(Special Scheduling Review Requested)

DAVID MISCAVIGE and CATHY  
NORMAN, individuals; CHURCH OF  
SCIENTOLOGY INTERNATIONAL, a  
California corporation; the RELIGIOUS  
TECHNOLOGY CENTER, a California  
corporation; the SEA ORGANIZATION,  
a California based unincorporated entity;  
and the CHURCH OF SCIENTOLOGY  
OF TEXAS, a Texas corporation.

Defendants.

The Plaintiff and counsel for Defendants, Church of Scientology International, Religious Technology Center, Cathy Norman and Church of Scientology of Texas, have conducted a conference in accordance with Fed. R. Civ. P. 26(f) and discussed the required topics. Defendants David Miscavige and Sea Organization, not having been served and therefore not having appeared, did not attend the conference. Pursuant to LR 26-l(d) and (e), the parties submit the following Discovery Plan and Scheduling Order:

1. Settlement. The parties are not optimistic that this case will be settled in the near future. The parties do not, at this time, request a settlement conference at the Court's earliest convenience to assist in the early resolution of this case.



1           2.     Disclosures and Discovery to Abide Court's Resolution of Pending Motions to Dismiss. On  
2 April 20, 1998, Defendants Church of Scientology International, Religious Technology Center, Cathy  
3 Norman and Church of Scientology of Texas filed their Motions to Dismiss Complaint for Lack of Subject  
4 Matter Jurisdiction; lack of Personal Jurisdiction; Improper Venue; and Because Plaintiff is a Fugitive from  
5 Justice. The motions have been fully submitted. The Court has stated that it "has reviewed the said motions  
6 and they appear to be facially well taken." Inasmuch as the motions challenge the jurisdiction of the court  
7 not only over the subject matter of this lawsuit, but over the defendants personally, defendants submit that  
8 it would be unduly burdensome to require them to engage in initial disclosures and discovery while the  
9 motions are still pending. Indeed, no party yet has commenced discovery of any kind. While plaintiff, of  
10 course, disagrees with defendants position as to the merits of the pending motions, plaintiff does agree that  
11 disclosure and discovery shall abide decision of the pending motions. In the event that the motions to  
12 dismiss are denied in whole or in part, the parties shall submit an amended Stipulated Discovery Plan and  
13 Scheduling Order, setting forth specific calendar dates in accordance and consistent with the stipulations  
14 set forth below in this document.

15           3.     Initial Disclosures. In the event the motions to dismiss are denied in whole or in part, the  
16 LR 26-l(a)2 Initial Disclosures will be due fifteen (15) days after the date of such order. The parties will  
17 serve the initial disclosures in accordance with Federal Rules of Civil Procedure.

18           4.     Discovery Deadline. In the event the motions to dismiss are denied in whole or in part,  
19 discovery shall be completed by 180 days after such order.

20           5.     Limitations on Discovery. In the event the motions to dismiss are denied in whole or in part,  
21 the parties believe that they can complete discovery within the ten deposition limit per side and within the  
22 forty interrogatory limit. Depositions shall be recorded by video graphic and stenographic means.

23           6.     Amending Pleadings and Adding Parties. If the motions to dismiss are denied in whole or  
24 in part, the deadline for amending pleadings and adding parties shall be 90 days after such order.


25           7.     Expert Disclosures. If the motions to dismiss are denied in whole or in part, expert  
26 disclosure shall be due no later than 120 days after such order and rebuttal expert disclosure shall be due  
27 no later than 30 days thereafter.

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1 8. Dispositive Motions. The parties request that the deadline for filing dispositive motions be  
2 extended to 30 days after the discovery deadline.

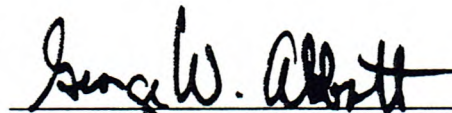
3 9. Pretrial Order. The parties request that the deadline for filing the Joint Pretrial Order be  
4 extended to 30 days after decision of the dispositive motions or further order of the court.

5 DATED this 6<sup>th</sup> day of July, 1998.

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13 *Attorneys for Defendants*  
14 *Church of Scientology International,*  
15 *Religious Technology Center,*  
16 *Church of Scientology of Texas and Cathy Norman*

17 DATED this 6<sup>th</sup> day of July, 1998.

18   
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24 *Attorney for Plaintiff*

25 IT IS SO ORDERED:

26 DATED: \_\_\_\_\_

27 \_\_\_\_\_  
28 UNITED STATES DISTRICT JUDGE